



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

via e-mail

February 12, 2020
FPU20-178

Ms. Catherine Jerrard
AFCEC/CIBW
706 Hangar Road
Rome, NY 13441

RE: WAFB – ADEQ Evaluation – *Final, Soil Vapor Extraction System and Other Activities, 2017 First and Second Quarter Performance Report, Former Liquid Fuels Storage Area, Site ST012, Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center [AFCEC/CIBW], Lackland AFB, TX; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec), Phoenix, AZ; document dated November 15, 2019.

Dear Ms. Jerrard:

Arizona Department of Environmental Quality (ADEQ) Federal Projects Unit (FPU) and ADEQ contractor UXO Pro, Inc. reviewed the documents and correspondence referenced above and below. ADEQ's purpose is to evaluate responses to ADEQ comments, and as appropriate, revised documents. ADEQ's evaluation follows the document list.

These documents and correspondence are associated by direct reference or inference:

- ADEQ Correspondence FPU19-172; dated April 3, 2019; sent to Ms. Catherine Jerrard, AFCEC/CIBW, Rome, NY; sent by Wayne Miller, ADEQ Project Manager.
RE: WAFB – ADEQ Comments – *Draft, Soil Vapor Extraction System, Operation and Maintenance, 2017 First and Second Quarter Performance Report, Former Liquid Fuels Storage Area, Site ST012, Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center (AFCEC/CIBW), Lackland AFB, TX; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec), Phoenix, AZ; document dated February 15, 2019.
- *Draft, Soil Vapor Extraction System, Operation and Maintenance, 2017 First and Second Quarter Performance Report, Former Liquid Fuels Storage Area, Site ST012, Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center (AFCEC/CIBW), Lackland AFB, TX; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec), Phoenix, AZ; document dated February 15, 2019.

ADEQ's evaluation follows.

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Evaluation

- (1) ADEQ acknowledges the majority of responses to the ADEQ April 3, 2019 comments (FPU19-172) are generally acceptable.
- (2) ADEQ notes that over 19 months elapsed between the end of second quarter, 2017 and ADEQ's receipt of the draft, 2017, first and second quarter soil vapor extraction system, operation and maintenance report (document dated February 15, 2019).
- (3) ADEQ notes that over 7 months elapsed between ADEQ's April 3, 2019 comment submittal and the November 15, 2019 response to ADEQ's comments.
- (4) ADEQ notes that elapsed time between actions and corrections will sustain deficiencies in subsequent actions and reporting.
- (5) ADEQ's evaluation noted that some additional clarification could benefit report users.

Additional Clarification Requests:

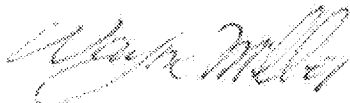
1. Refer to FPU19-172; Specific Comment 18 (Analytical Data Validation Package 280-93747). Please provide the requested discussions and revisions. The comment requested multiple edits. However, the "final" report did not include the specified, revised, data validation report.

Closure

ADEQ may add or amend comments, evaluations, and concurrence if evidence to the contrary of our understanding is discovered; if received information is determined to be inaccurate; if any condition was unknown to ADEQ at the time this document was delivered; if other parties bring valid concerns to our attention; or site conditions are deemed not protective of human health and the environment within the scope of this Department.

Thank you for the opportunity to comment. Should you have any questions regarding this correspondence, please contact me by phone at (602) 771-4121 or e-mail miller.wayne@azdeq.gov.

Sincerely,



Wayne Miller
ADEQ Project Manager, Federal Projects Unit
Remedial Projects Section, Waste Programs Division

cc:

Catherine Jerrard, USAF AFCEC/CIBW
Carolyn d'Almeida, U.S. EPA
William Hughes, CNSP
Steve Willis, UXO Pro, Inc.
ADEQ Reading and Project File

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